

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

BOKF NA, et al.,

Plaintiffs,

v.

VICKIE SUE WISE, et al.,

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Case No. 3:18-CV-00794-N

PLAINTIFF BOKF, N.A.'s DESIGNATION OF EXPERTS

Plaintiff, BOKF, N.A. ("BOKF"), pursuant to Fed. R. Civ. P. 26(a)(2), hereby designates its Expert Witnesses.

A. EXPERT WITNESSES:

In accordance with FRCP 26(a)(2)(C) and the *Scheduling Order* (Doc. 21), the following individuals are likely to provide expert testimony but have not been specifically retained and whose duties on behalf of BOKF do not involve giving expert testimony. Therefore no written reports are required from the following expert witnesses:

Name	Address	Subjects of Potential Knowledge
Mr. Patrick Staudt Senior Vice President/Private Wealth BOKF	5956 Sherry Lane 7 th Floor Dallas, Texas 75225 c/o counsel for BOKF	BOKF designates Mr. Staudt as an expert in his field with regard to Private Wealth and financial performance. Mr. Staudt is the senior bank officer responsible for Private Wealth in the DFW market area. Each of the individual Defendants reported to Mr. Staudt prior to the planned and coordinated termination of their employment with BOKF. Mr. Staudt will testify about the business activities of the individual Defendants during their employment with BOKF, their historical financial performance, anticipated financial performance and the substantial

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		financial losses caused by their departures in violation of agreements and promises with BOKF causing extensive damages to BOKF. Mr. Staudt will offer opinions as to the advanced planning for the termination of employment being carefully orchestrated by all of the Defendants that allowed them to achieve maximum opportunity to capture BOKF's existing customer relationships. Mr. Staudt will offer his opinion about the marketing efforts by Defendants to maximize the loss of customer relationships to BOKF. Mr. Staudt will offer his opinion about the financial damages caused by the orchestrated plans of the Defendants to divert BOKF business opportunities and relationships to them.
Erica Anne Dorwart FREDERIC DORWART, LAWYERS PLLC	Old City Hall 124 East Fourth Street Tulsa, Oklahoma 74103 Counsel for BOKF	BOKF designates Ms. Dorwart as an attorney fee expert. Ms. Dorwart is a licensed Oklahoma attorney with almost 20 years of legal experience. A substantial part of her legal practice involves employment and human resource law, including litigation of cases through the Southwest for BOKF. She will testify about her involvement in the representation of BOKF with the firm's role as General Counsel to BOKF. Ms. Dorwart will explain her time and tasks in the case and seek to recover BOKF's reasonable attorney's fees and costs prevailing in the area of attorney's handling similar cases.
John D. Clayman FREDERIC DORWART, LAWYERS PLLC	Old City Hall 124 East Fourth Street Tulsa, Oklahoma 74103	BOKF designates Mr. Clayman as a testifying expert on the amount, reasonableness, and necessity of attorney's fees by any party claiming attorneys' fees in this matter. Mr. Clayman is an attorney licensed to practice law in Texas and currently practices in litigation at the law firm of Frederic Dorwart, Lawyers PLLC, the general counsel for BOKF. Mr. Clayman will base his testimony on their

Name	Address	Subjects of Potential Knowledge
		<p>experience as attorneys practicing in Dallas County, Texas, and the factors determined by the Texas Supreme Court for award of fees. He will also base his testimony on his review of the pleadings, discovery, correspondence, and documents exchanged in this action as well as the attorneys' fees and costs statements of the parties to this case.</p> <p>Mr. Clayman is familiar with the legal services rendered on behalf of BOKF, the pleadings on file in this lawsuit, the discovery conducted, and the correspondence and documents exchanged between counsel of record.</p>
Brett Field STROMBERG STOCK	8750 N. Central Expressway Suite 625 Dallas, Texas 75231	<p>BOKF designates Mr. Field as a testifying expert on the amount, reasonableness, and necessity of attorney's fees by any party claiming attorneys' fees in this matter. Mr. Field is an attorney licensed to practice law in Texas and currently practices in litigation at the law firm of Stromberg Stock.</p> <p>Mr. Field will base his testimony on their experience as attorneys practicing in Dallas County, Texas, and the factors determined by the Texas Supreme Court for award of fees. He will also base his testimony on his review of the pleadings, discovery, correspondence, and documents exchanged in this action as well as the attorneys' fees and costs statements of the parties to this case.</p> <p>Mr. Field is familiar with the legal services rendered on behalf of BOKF, the pleadings on file in this lawsuit, the discovery conducted, and the correspondence and documents exchanged between counsel of record.</p>

The parties in this case have conducted limited discovery to date. As such, BOKF reserves the right to supplement or correct this designation in accordance with Federal Rule of Civil

Procedure 26(e). BOKF also reserves the right to designate additional experts in rebuttal to any expert designated by Plaintiff or the other Defendants.

In addition, without stipulating to the qualifications of any other expert, BOKF reserves the right to elicit expert testimony from any witness furnishing expert testimony or tendered as an expert, whether or not formally designated by any party.

Further, by making these designations of BOKF expert witnesses, BOKF does not intend to waive any applicable privilege or work product protection and expressly reserves its right to object to the production or disclosure of any of the information identified herein on those grounds.

Respectfully submitted,

s/Erica Anne Dorwart
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CERTIFICATE OF SERVICE

The undersigned certifies that on the 7th day of December, 2017, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court for the United States District Court for the Northern District of Texas, Dallas Division, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to those attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/Brett Field
Brett Field